

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>04-749</u>
v.	:	DATE FILED: _____
KELVIN WELMAKER,	:	VIOLATIONS:
a/k/a "KK,"	:	21 U.S.C. § 846 (conspiracy to distribute
JAMARR DELMONT WELMAKER	:	cocaine base ("crack") - 1 count)
JULIAN ACOSTA,	:	21 U.S.C. § 841(a)(1) (possession with the
a/k/a "Dooley,"	:	intent to distribute cocaine base ("crack")
MICHAEL KEITH BOWEN,	:	- 5 counts)
a/k/a "Bubby,"	:	21 U.S.C. § 841(a)(1) (distribution of
ROGEL GRANT,	:	cocaine base ("crack") - 12 counts)
a/k/a "Bradley,"	:	21 U.S.C. § 860(a) (distribution of cocaine
DANTE JACKSON	:	base ("crack") within 1000 feet of school
RANDY DALE JACKSON	:	- 1 count)
LUIS DANIEL MARERRO,	:	18 U.S.C. § 924(c)(1) (possession of a
a/k/a "Danny,"	:	firearm in furtherance of a drug
ALPHA OUMAR SACKO,	:	trafficking offense – 3 counts)
a/k/a "Binks,"	:	21 U.S.C. § 853 (criminal forfeiture)
ANTOINE LAMAR SHIRLEY,	:	18 U.S.C. § 2 (aiding and
a/k/a "Stink"	:	abetting)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about January 2002 through in or about March 2005, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendants

KELVIN WELMAKER,
a/k/a "KK,"
JAMARR DELMONT WELMAKER,
JULIAN ACOSTA,
a/k/a "Dooley,"
MICHAEL KEITH BOWEN,
a/k/a "Bubby,"

**ROGEL GRANT,
a/k/a “Bradley,”
DANTE JACKSON,
RANDY DALE JACKSON,
LUIS DANIEL MARERRO,
a/k/a “Danny,”
ALPHA OUMAR SACKO,
a/k/a “Binks,”
ANTOINE LAMAR SHIRLEY,
a/k/a “Stink”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute more than 50 grams, that is, approximately 30 kilograms, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. The WELMAKER CRACK COCAINE DISTRIBUTION ORGANIZATION (“WELMAKER ORGANIZATION”) was a cocaine base (“crack”) distribution organization that initially operated in the northwest section of the city of Reading, Pennsylvania and extended its operation to the entire city of Reading and surrounding areas. The WELMAKER ORGANIZATION included more than 10 members who purchased and sold approximately 34 kilograms of crack cocaine valued at more than \$3,400,000 on a retail basis.
3. From on or about January 2002 through on or about February 2005, defendants KELVIN WELMAKER and JAMARR DELMONT WELMAKER managed and controlled the WELMAKER ORGANIZATION and the distribution of crack cocaine in the northwest section of the city of Reading.

4. Defendants KELVIN WELMAKER and JAMARR DELMONT

WELMAKER purchased cocaine and crack cocaine from suppliers in Reading and elsewhere. At the direction of defendants KELVIN WELMAKER and JAMARR DELMONT WELMAKER, other members of the WELMAKER ORGANIZATION processed the cocaine into crack cocaine.

5. Defendants KELVIN WELMAKER and JAMARR DELMONT

WELMAKER delivered bundles of crack cocaine, called “G Packs,” which consisted of 100 packets of “crack” cocaine that sold for \$10 each, to other members of the WELMAKER ORGANIZATION for distribution at the locations listed in paragraph 6 or directly to buyers at prearranged meetings.

6. Defendants KELVIN WELMAKER and JAMARR DELMONT

WELMAKER staffed, supervised, managed, controlled, led, and supplied the WELMAKER ORGANIZATION locations listed below in Reading and West Reading with crack cocaine to members of the organization, who sold to customers of the organization.

- 251 Pear Street, Reading;
- 198 W. Elm Street, Reading;
- 317 N. Front Street, Reading; and
- 30 S. 6th Avenue, West Reading.

7. Defendants JULIAN ACOSTA, MICHAEL KEITH BOWEN, ROGEL

GRANT, DANTE JACKSON, RANDY DALE JACKSON, LUIS DANIEL MARERRO, ALPHA OUMAR SACKO, and ANTOINE LAMAR SHIRLEY were responsible for selling crack cocaine to customers at some of the WELMAKER ORGANIZATION controlled locations

listed in paragraph 6 and/or at locations arranged through calls to cellular phones used by the organization.

8. Defendants KELVIN WELMAKER, JAMARR DELMONT WELMAKER, JULIAN ACOSTA, MICHAEL KEITH BOWEN, ROGEL GRANT, DANTE JACKSON, RANDY DALE JACKSON, LUIS DANIEL MARERRO, ALPHA OUMAR SACKO and ANTOINE LAMAR SHIRLEY carried and used cellular phones to communicate with other members of the WELMAKER ORGANIZATION and to arrange for the delivery of crack cocaine to customers.

9. Defendants JULIAN ACOSTA, MICHAEL KEITH BOWEN, ROGEL GRANT, DANTE JACKSON, RANDY DALE JACKSON, LUIS DANIEL MARERRO, ALPHA OUMAR SACKO and ANTOINE LAMAR SHIRLEY rented vehicles or paid persons, known and unknown to the grand jury, to drive them to make deliveries of crack cocaine to customers at prearranged locations.

10. To protect the WELMAKER ORGANIZATION operation and its distribution locations, and to prevent the theft of crack cocaine possessed by the organization and its members, defendants KELVIN WELMAKER, JAMARR DELMONT WELMAKER, MICHAEL KEITH BOWEN, and ALPHA OUMAR SACKO used and carried firearms.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in Reading, in the Eastern District of Pennsylvania, and elsewhere:

1. In or about January 2002, defendants KELVIN WELMAKER and

JAMARR DELMONT WELMAKER established an operation in the City of Reading, Pennsylvania to distribute cocaine base (“crack”) (crack cocaine).

2. In or about January 2002, defendants KELVIN WELMAKER and JAMARR DELMONT WELMAKER established a crack cocaine distribution operation in the area of 251 Pear Street in Reading, Pennsylvania.

3. In or about August 2002, defendants KELVIN WELMAKER and JAMARR DELMONT WELMAKER established a crack cocaine distribution operation in the area of 198 W. Elm Street in Reading, Pennsylvania.

4. In or about September 2002, defendants KELVIN WELMAKER and JAMARR DELMONT WELMAKER established a crack cocaine distribution operation in the area of 317 N. Front Street in Reading, Pennsylvania.

5. On or about January 7, 2003, defendants KELVIN WELMAKER, JAMARR DELMONT WELMAKER, and RANDY DALE JACKSON and others known to the grand jury:

a. possessed approximately .66 grams of crack cocaine which they intended to sell from 317 N. Front Street in Reading, Pennsylvania; and

b. possessed a loaded Taurus, Model PT 111, 9mm semi-automatic handgun, serial # TVH43497; a loaded Femaru .380 caliber semi-automatic handgun, serial # 213381; and a Remington, Model 700, 7 mm. rifle, serial # 56051.

6. In or about January 2003, defendants KELVIN WELMAKER and JAMARR DELMONT WELMAKER established a crack cocaine distribution operation in the area of 30 S. 6th Street in West Reading, Pennsylvania.

7. On or about April 24, 2003, defendant JAMARR DELMONT WELMAKER and others known to the grand jury:
- a. possessed 37 packets containing approximately 3.37 grams of crack cocaine which they intended to sell from 30 S. 6th Avenue in West Reading, Pennsylvania; and
 - b. possessed an AK-47S Prochine Corporation, 7.62 caliber rifle, serial # 8706490, with two magazines loaded with a total of 45 rounds.
8. On or about April 4, 2004, defendants MICHAEL KEITH BOWEN, RANDY JACKSON and LUIS DANIEL MARERRO possessed 11 packets containing approximately 1.6 grams of crack cocaine which they intended to sell in the 1100 block of Cotton Street, Reading, Pennsylvania.
9. On or about August 18, 2004, defendant MICHAEL KEITH BOWEN delivered nine packets containing approximately 1.5 grams of crack cocaine to Person #1, known to the grand jury, in the 900 block of Oley Street in Reading, Pennsylvania.
10. On or about September 1, 2004, defendant ALPHA OUMAR SACKO delivered 10 packets containing approximately 1.3 grams of crack cocaine to Person #1 in the 400 block of Woodward Street in Reading, Pennsylvania.
11. On or about September 2, 2004, defendant ALPHA OUMAR SACKO possessed for sale uncut crack cocaine and an additional 36 packets totaling approximately 15.55 grams of crack cocaine for sale in the 800 block of Douglass Street in Reading, Pennsylvania.
12. On or about September 15, 2004, defendant MICHAEL KEITH BOWEN delivered 30 packets containing approximately 4.9 grams of crack cocaine to Person #2, known to

the grand jury, at 632 N. 10th Street in Reading, Pennsylvania.

13. On or about September 15, 2004, defendants KELVIN WELMAKER and MICHAEL KEITH BOWEN delivered 10 packets containing approximately 1.6 grams of crack cocaine to Person #1 in the vicinity of the 400 block of Green Terrace in Reading, Pennsylvania.

14. On or about September 20, 2004, defendants JULIAN ACOSTA, DANTE JACKSON and ANTOINE LAMAR SHIRLEY delivered 30 packets containing approximately 4.9 grams of crack cocaine to Person #2 at Thorn and Douglass Streets in Reading, Pennsylvania.

15. On or about September 28, 2004, defendants KELVIN WELMAKER JULIAN ACOSTA, and DANTE JACKSON delivered 29 packets containing approximately 5.9 grams of crack cocaine to Person #2 at Thorn and Douglass Streets in Reading, Pennsylvania.

16. On or about September 28, 2004, defendant ROGEL GRANT delivered approximately one-quarter ounce (6 grams) of crack cocaine to an undercover detective at 5th Street and Center Avenue in Reading, Pennsylvania.

17. On or about October 12, 2004, defendant ROGEL GRANT delivered approximately one-quarter ounce (5.2 grams) of crack cocaine to an undercover detective at 5th Street and Center Avenue in Reading, Pennsylvania.

18. On or about October 14, 2004, defendant ROGEL GRANT delivered approximately one ounce (28.3 grams) of crack cocaine to an undercover detective at 5th Street and Center Avenue in Reading, Pennsylvania.

19. On or about October 19, 2004, at the direction of defendant ALPHA SACKO, a person known to the grand jury delivered approximately .48 grams of crack cocaine to

Person #1 in the vicinity of the 300 block of Reed Street in Reading, Pennsylvania.

20. On or about October 26, 2004, defendant ROGEL GRANT delivered approximately four ounces (86.4 grams) of crack cocaine to an undercover detective at 5th Street and Center Avenue in Reading, Pennsylvania.

21. On or about October 26, 2004, defendant ROGEL GRANT possessed approximately one ounce (27.8 grams) of crack cocaine for sale at 5th Street and Center Avenue in Reading, Pennsylvania.

22. On or about January 6, 2005, at the direction of defendants KELVIN WELMAKER and RANDY DALE JACKSON, Person #3, known to the grand jury, delivered approximately .85 grams of crack cocaine to Person #4, known to the grand jury, in the 400 block of W. Douglass Street in Reading, Pennsylvania.

23. On or about January 12, 2005, at the direction of defendants KELVIN WELMAKER and ANTOINE LAMAR SHIRLEY, Person #3 delivered approximately 72 grams of crack cocaine to Person #4 at Schuylkill Avenue and West Buttonwood Street in Reading, Pennsylvania.

24. On or about January 12, 2005, defendants KELVIN WELMAKER and ANTOINE LAMAR SHIRLEY carried a stolen Springfield Armory, Model Champion, .45 caliber semi-automatic handgun, serial # N442811.

25. On or about March 10, 2005, defendants RANDY JACKSON and DANTE JACKSON possessed 50 packets (7.2 grams) of crack cocaine for sale and a scale in the 600 block of Ritter Street in Reading, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2003, in Reading, in the Eastern District of
Pennsylvania, defendants

**KELVIN WELMAKER,
a/k/a “KK,”
JAMARR DELMONT WELMAKER, and
RANDY DALE JACKSON**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and
Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2003, in Reading, in the Eastern District of Pennsylvania,
defendants

**KELVIN WELMAKER,
a/k/a "KK,"
JAMARR DELMONT WELMAKER, and
RANDY DALE JACKSON**

knowingly possessed, and aided and abetted the possession of, firearms, that is, a loaded Taurus, Model PT 111, 9mm semi-automatic handgun, serial # TVH43497, a loaded Femaru .380 caliber semi-automatic handgun, serial # 213381, and a Remington, Model 700, 7 mm. rifle, serial # 56051, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 24, 2003, in West Reading, in the Eastern District of Pennsylvania, defendant

JAMARR DELMONT WELMAKER

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 24, 2003, in West Reading, in the Eastern District of Pennsylvania, defendant

JAMARR DELMONT WELMAKER

knowingly possessed, and aided and abetted the possession of, a firearm, that is, an AK-47S Prochine Corporation, 7.62 caliber rifle, serial # 8706490, with two magazines loaded with a total of 45 rounds, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

**MICHAEL KEITH BOWEN,
a/k/a “Bubby,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2004, in Reading, in the Eastern District of
Pennsylvania, defendant

**ALPHA OUMAR SACKO,
a/k/a “Binks,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 2004, in Reading, in the Eastern District of Pennsylvania, defendant

**ALPHA OUMAR SACKO,
a/k/a “Binks,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 grams, that is approximately 15.55 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2004, in Reading, in the Eastern District of Pennsylvania, defendant

**MICHAEL KEITH BOWEN,
a/k/a “Bubby,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2004, in Reading, in the Eastern District of Pennsylvania, defendant

**MICHAEL KEITH BOWEN,
a/k/a “Bubby,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the 10th and Green Elementary School, a public elementary school, located at 400 North 10th Street, Reading, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2004, in Reading, in the Eastern District of Pennsylvania, defendants

**KELVIN WELMAKER,
a/k/a “KK,” and
MICHAEL KEITH BOWEN,
a/k/a “Bubby,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 20, 2004, in Reading, in the Eastern District of Pennsylvania, defendants

**JULIAN ACOSTA,
a/k/a “Dooley,”
DANTE JACKSON, and
ANTOINE LAMAR SHIRLEY,
a/k/a “Stink,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 28, 2004, in Reading, in the Eastern District of Pennsylvania, defendants

**KELVIN WELMAKER,
a/k/a “KK,”
JULIAN ACOSTA,
a/k/a “Dooley,” and
DANTE JACKSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, more than 5 grams, that is approximately 5.9 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 28, 2004, in Reading, in the Eastern District of Pennsylvania, defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 5 grams, that is approximately 6.0 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 12, 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 5 grams, that is, approximately 5.2 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 14, 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 5 grams, that is, approximately 28.3 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 50 grams, that is, approximately 86.4 grams, of
a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2004, in Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally possessed with intent to distribute more than 5 grams, that is
approximately 27.8 grams, of a mixture or substance containing a detectable amount of cocaine
base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2005, in Reading, in the Eastern District of Pennsylvania,
defendants

**KELVIN WELMAKER,
a/k/a “KK,” and
RANDY DALE JACKSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2005, in Reading, in the Eastern District of Pennsylvania,
defendants

**KELVIN WELMAKER,
a/k/a “KK,” and
ANTOINE LAMAR SHIRLEY,
a/k/a “Stink”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2005, in Reading, in the Eastern District of Pennsylvania,
defendants

**KELVIN WELMAKER,
a/k/a “KK,” and
ANTOINE LAMAR SHIRLEY,
a/k/a “Stink”**

knowingly carried, and aided and abetted the carrying of, a firearm, that is, a loaded Springfield Armory, Model Champion, .45 caliber semi-automatic handgun, serial # N442811, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, that is, distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2005, at Reading, in the Eastern District of Pennsylvania,
defendants

**DANTE JACKSON
and
RANDY DALE JACKSON**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with the intent to distribute, more than 5 grams, that is approximately 7.2 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1) and 860(a) charged in this indictment, defendants

**KELVIN WELMAKER,
a/k/a “KK,”
JAMARR DELMONT WELMAKER,
JULIAN ACOSTA,
a/k/a “Dooley,”
MICHAEL KEITH BOWEN,
a/k/a “Bubby,”
ROGEL GRANT,
a/k/a “Bradley,”
DANTE JACKSON,
RANDY DALE JACKSON,
LUIS DANIEL MARERRO,
a/k/a “Danny,”
ALPHA OUMAR SACKO,
a/k/a “Binks,”
ANTOINE LAMAR SHIRLEY,
a/k/a “Stink”,**

shall forfeit to the United States of America:

a. any property constituting or derived from proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code, as charged in this superseding indictment; and

b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, Sections 846, 841(a)(1), and 860(a) charged in this superseding indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property subject to forfeiture.

All pursuant to Title 21, United States Code, Sections 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney